

not used

DEF. DOC. # 1300

Translated by
Defense Language Branch

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

- vs -

RAKI, Sadao, et al

Sworn Deposition (Translation)

Deponent ; -- GENDA, Minoru

Having first duly sworn an oath as on attached sheet and in accordance with the procedure followed in my country I hereby depose as follows.

Address : Care of Uyoda, 147 Higashi Kojima-machi, Nagasaki.

Birth: August 16, 1904

1) Brief personal career.

November 1936 Lieutenant Commander, Staff officer of the 2nd
Combined Air Force.

November 1940, Commander, Staff officer of the 1st Air Squadron.

October 1944, Captain, Staff Officer of Imperial headquarters.

2) Career at the front since the beginning of the China Incident.

Early September, 1937 Arrived in Shanghai.

From September, 1937, to December 20, 1937

On duty in Shanghai.

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From about December 20 to January, 1933, On duty in Nanking.

January, 1933

Returned to Japan.

Throughout the foregoing period I was a staff officer of the 2nd Combined Air Force.

3) The strength and chain of command of the air force to which I was attached at the time of my tenure.

The 2nd Combined Air Force was under the command of the 3rd Fleet.

Its commanding officer up to December 14 or 15, 1933 was Rear Admiral Minami. After the "Panay" incident he was succeeded on December 14 or 15, 1933, by Rear Admiral Tsukahara. Under the command of the 2nd Combined Air Force were the 12th and 13th Air Squadrons.

In the 13th Air Squadron there were 12 fighters and 13 bombers. Later 6 attack planes were added.

There were 12 fighters, 12 bombers and an uncertain number of attack planes in the 12th Air Squadron. The base was in Shanghai, and later a liaison office was set up in Changchow.

4) The military objectives of our air force at that time were to bomb Nanking, collaborate with the military operation, and to bomb the Hankow and Nanchang airfields. The purpose of Nanking bombing was to destroy enemy fighting planes and principal military installations, etc. The principal military establishments were airfields, vital government offices (wireless stations, general^d ~~army~~ ^{army} headquarters, nationalist government nationalist government broadcast^sing station, etc.) communications facilities, railway stations. Hsiakuan electric light plant

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and the Yuhuatai and Shilitzushan batteries, I was engaged in this campaign from September 19 to September 25, 1937. From about the early part of January 1938, we attacked airfields in Hankow, Nanchang, etc. In these bombings we used fighter planes to support the 1st Combined Air Force bombers.

Soon after the said supporting attack of our air units commenced, I left Nanking and was assigned to duty in Japan proper.

During this period we continued to collaborate with military operations, but the targets of our attacks were trenches at the front line, enemy camps and trucks engaged in transportation to the front line. 54 During the China Incident the bombings of the Japanese Naval Air Force were carried out in accordance with the "Standards of Aerial Warfare" and "Miscellaneous Regulations Pertaining to Bombing" provided in July, 1938, and September, 1938, respectively. There were sent to the all units by the central authorities.

The various regulations and precedents concerning the current attack objectives were considered, and bombing was restricted to purely military objectives. Cities themselves, whether fortified or not, were never made objects of attack.

Even in the case of an objective which was clearly military, if an attack on it was likely to cause serious damage to the general populace or, if it was difficult to ascertain the location of the objective, we refrained out of humanitarian feelings from making attacks.

Also in our bombings we were scrupulously careful with respect to

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third powers and property¹⁰⁸ belonging to third power nationals and their rights not only in the international settlement and in the Japanese residential section but also outside the concessions. Because of this our air force was very much restricted in their attack operations and suffered considerable disadvantage and damages.

6) Particularly, in order to respect the rights of third powers the General Naval Staff received maps showing the various foreign interests in the combat zone. These maps were distributed to the lowest units, and received the most careful consideration.

7) Also, before starting out on a bombing expedition the squadron commander instructed all subordinates concerning the bombing objectives were and strictly forbade the bombing of any other objectives.

8) During the time I was there the quality of the air squadron pilots was good. They had an average of about 500 hours of flying time, and two to three years had elapsed since they had become pilots. Therefore they were in a position to recognize objectives, and their bombings were good and precise.

On this 20 day of December, 1936, at Tokyo

DEPONENT /S/ GENDL, Minoru (seal)

I, INAGAWA, Tatsuo hereby certify that the above statement was sworn by the Deponent, who affixed his signature and seal thereto in the presence of this Witness.

On the same date, at Tokyo.

Witness : /S/ INAGAWA, Tatsuo (seal)

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OATH

In accordance with my conscience I swear to tell the whole truth
withholding nothing and adding nothing.

/S/ GENDL., Minoru (seal)

Translation Certificate

I, Charlie S. Terry of the Defense Language Branch, hereby certify
that the foregoing translation described in the above certificate is,
to the best of my knowledge and belief, a correct translation and is
as near as possible to the meaning of the original document.

/S/ Charlie S. Terry

Tokyo, Japan
Date April 21, 1947

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自分儀我國ニ行ハルル方式ニ從ヒ先ヅ別紙ノ通り宣誓ヲ爲シタル上次
ノ如ク供述致シマス

極東國際軍事裁判所

亞米利加合衆國其他

對

荒木貞夫其他

宣誓供述者

供述者

長崎市東小島町一四七榎田方
源 實

明治三十七年八月十六日生

一、自分ノ職歴ハ大要左ノ通りデス

昭和十一年十一月海軍少佐一第二聯合航空隊參謀

同 十五年十一月海軍中佐一第一航空戰隊參謀

同 十九年 十月海軍大佐一大本營參謀

二、自分ガ支那事變ノ初メ現地ニ居タノハ左ノ通りデス

昭和十二年 九月初一上海着

同 年九月一十二月二十日頃迄上海勤務

同 年十二月二十日頃ヨリ一同十三年一月迄南京勤務

昭和十三年一月内地歸還

石期同ヲ過ジテ自分ハ第二聯合航空隊參謀ヲシテ居リマシタ

三、自分ガ在任當時ノ自分ノ屬スル航空隊ノ兵力並ニ指揮系統ハ左ノ通り
デス

第三艦隊ノ下ニ第二聯合航空隊ガアリ司令官ハ昭和十二年十二月十四、
五日迄ハ三並少將デアリ「ハネー」號事件後同月十四、五日附テ塚原
少將ガ交替シテ居リマス

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其ノ下ニ第十二航空隊、第十三航空隊ガアリマシタ

第十三航空隊ニハ戦闘機十二機、爆撃機十八機ガ屬シ後ニ攻撃機六機ガ増加サレマシタ

第十二航空隊ニハ戦闘機十二機、爆撃機十二機、攻撃機？機ガ屬シテ居リマシタ

基地ハ上海ニアリ後程常州ニ連絡所ヲ置キマシタ

當時自分等航空隊ノ作戰目標ハ南京爆撃、鹽城協力、漢口、南昌飛行場爆撃等テ南京爆撃ノ目的ハ敵國機體滅亡、主要軍事施設ノ破壊等デアリマシタ

軍事施設ノ主ナルモノトシテ當時飛行場、主要官衙（無電台、憲兵司令部、國民政府、放送局等）交通機關、停車場、下關電燈廠、雨花台獅子山砲台等デアリマシテ概ネ昭和十二年九月十九日―同年同月二十五日迄ノ間此ノ作戦ニ從事シマシタ

昭和十三年一月初頃ヨリ漢口、南昌飛行場等ノ攻撃ヲ試シマシタガ是等ハ第一聯合航空隊ノ爆撃ニ對シ我々ハ戦闘機隊ニヨル援護ヲ目的ト

シタモノデアリマシタ

吾方航空隊ニヨル右援護攻撃開始後間モナク自分ハ南京ヲ去リ内地勤務トナリマシタ

コレ等ノ期間中陸戦ニ協力スル作戰ハ繼續サレテ居リマシタガ攻撃目標ハ前線ノ塹壕、敵陣地、前線間輸送ノ「トラック」等デアリマス

支那事變中ニ於ケル日本海軍航空隊ノ爆撃ハ昭和十二年七月八日昭和十二年九月規定サレタ「空戦ニ關スル標準」及「爆撃規則」ニ關スル雜件等ニヨリ中央ヨリ管下全部隊ニ告達セラレテ居リマシタ

攻撃目標ハ從來ノ空戦ニ關スル各種法規實例ヲ參酌シ最も公正ナ軍事目標ニ限定サレ、防備セラレテアルト否トニ拘ラズ都市自体ヲ攻撃目標トシタ如キハ實テアリマセンデシタ

而モ假令軍事目標タルコトガ明瞭ナ場合デモ之ヲ攻撃スレバ一般民衆ニ重大ナ損害ヲ及ボス虞レアル場合及ビ之ノ確認ガ困難ナ場合ハ人道上ノ見地ヨリシテ攻撃ヲ差控ヘテ居リマシタ

又爆撃ニアタリ第三國人及第三國ニ屬スル物件（共同租界、專管居留

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地ハ勿論租界外ト雖モ第三國人ノ利害緊密ナル部分ニ對シテハ細心ノ注意ヲ拂ヒマシム

其ノ爲我航空隊ハ其ノ攻撃行動ヲ著シク制限サレ大ナル不利ト多大ノ損害ヲ蒙ツタ程デシタ

六殊ニ第三國ノ權益ヲ尊重スル爲メ軍令部ヨリハ豫メ作戰區域ニ於ケル第三國權益ヲ標記シタ圖面ヲ受ケ之等ハ末端ニ至ル迄配布サレ細心ノ注意ヲ拂ツテ居タ譯デアリマス

又又爆撃出發ニ際シテハ隊長ヨリ部下一同ニ對シ爆撃目標ヲ命令シ爆撃目標以外ヲ攻撃スルコトナキ様其ノ都度嚴重注意シテ居リマシタ

八私ガ居タ當時航空隊ノ搭乗員ノ素質ハ極メテ良ク平均五〇〇時間位ノ飛行時間ヲ有シ搭乗員ニナツテカラ二年乃至三年ヲ経過シテ居ル者バカリデアリマシタ、從ツテ目標ノ確認、爆撃精度モ良好ニ保持サレテ居リマシタ

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昭和二十一年（一九四六年）十二月二〇日於東京

供述者 源 田 實

右ハ當立會人ノ面前ニテ宣誓シ且ツ署名捺印シタルコトヲ證
明シマス

同日 於同

立會人 辯護士
稻 川 龍 雄

1600 7/100

宣
誓
書

良心ニ從ヒ眞實ヲ述ベ何事ヲモ默秘セズ又何事ヲモ附加セザ
ルコトヲ誓フ

(署名)
捺印) 源 田 實